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ORIGINAL

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF HAWAII

FILED IN THE
 UNITED STATES DISTRICT COURT
 DISTRICT OF HAWAII

NOV 27 2006 Ag

UNITED STATES OF AMERICA) CR. NO. 02-0288 DAE	at <u>8</u> o'clock and <u>55</u> min M
)	SUE BETIA, CLERK
Plaintiff,)	
)	
vs.) NOTICE OF MOTION; MOTION TO	
JERI-ANN LEWIS,) WITHDRAW AS COUNSEL AND	
) HAVE SUBSTITUTE COUNSEL	
Defendant.) APPOINTED; DECLARATION OF	
) GARY G. SINGH; CERTIFICATE OF	
) SERVICE	
) Hearing Date:	
) Date: November 30, 2006	
) Time: 10:00 A.M.	
) Judge: Kevin S. C. Chang	

NOTICE OF MOTION

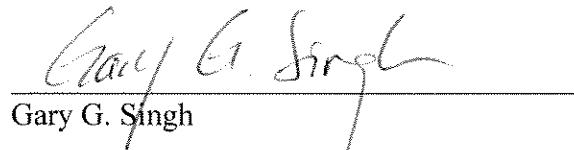
TO:

EDWARD H. KUBO, JR.
 United States Attorney
 At: Chris Thomas, Esq.
 300 Ala Moana Boulevard
 Honolulu, Hawaii 96813
 Attorney for Plaintiff
 United States of America

NOTICE IS HEREBY GIVEN That the Motion to Withdraw as Counsel and have Substitute Counsel Appointed shall come on for hearing before the Honorable Judge Kevin S. C. Chang, Judge of the above-entitled Court, in his courtroom in the United States Courthouse, PJKK Federal Building, 300 Ala Moana Boulevard, Honolulu, Hawaii, on November 30, 2006 at 10

A.M., or as soon thereafter as counsel may be heard.

DATED: Honolulu, Hawaii, November 27, 2006



Gary G. Singh

Attorney for Defendant
Jeri-Ann Lewis

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAI'I

UNITED STATES OF AMERICA) CR. NO. 02-0288 DAE
)
Plaintiff,)
) **MOTION TO WITHDRAW AS**
vs.) **COUNSEL AND HAVE SUBSTITUTE**
) **COUNSEL APPOINTED**
JERI-ANN LEWIS)
Defendant.)
)
)

**MOTION TO WITHDRAW AS COUNSEL
AND HAVE SUBSTITUTE COUNSEL APPOINTED**

COMES NOW GARY G. SINGH, counsel for Defendant Jeri-Ann Lewis, and moves this Honorable Court for an Order allowing GARY G. SINGH to withdraw as counsel, and have Substitute Counsel appointed for the Defendant Jeri-Ann Lewis.

This motion is based on the Defendant's right to the Effective Assistance of Counsel and her right to Appointed Counsel, guaranteed to her under the 6th Amendment of the United States Constitution. This motion is further based in accordance with Rule 1.16 of the Hawaii Rules of Professional Conduct. Specifically, Defendant's failure to cooperate with Counsel in trial preparation. Furthermore, on November 23, 2006, Defendant terminated Counsel's representation during a visit at the Federal Detention Center. This motion is supported by the attached Declaration of Gary G. Singh, the records and files herein and any further evidence that may be presented at a hearing on this motion.

Dated: Honolulu, Hawaii, November 27, 2006.

Gary G. Singh
GARY G. SINGH
Attorney for Defendant